

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SYMBRIA, INC., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	Case No.: 1:20-cv-04084
	)	
v.	)	Judge Mary M. Rowland
	)	
JOHN R. CALLEN, <i>et al.</i> ,	)	Judge M. David Weisman
	)	
Defendants.	)	

**PLAINTIFFS' STATUS REPORT ON  
SETTLEMENT AND PROPOSED DISCOVERY SCHEDULE**

Pursuant to the Court's October 6, 2022 Order (Dkt. 587), Plaintiffs Symbria, Inc., Symbria Rehab, Inc., Alliance Rehab of Connecticut, LLC, Alliance Rehab HVA, L.L.C., GreatBanc Trust Company, not in its individual or corporate capacity but solely in its capacity as Trustee of the Symbria, Inc. Employee Stock Ownership Trust, and the Symbria, Inc. Employee Stock Ownership Trust (collectively, "Plaintiffs") respectfully submit their status report with an update on settlement and a proposed discovery schedule.

**I. Settlement Update**

Plaintiffs and Defendants Pearl Health Care Services, Inc. and Illinois Ancillary Services Network, LLC have tentatively agreed on settlement terms subject to execution of a written settlement agreement, and have exchanged drafts of a settlement agreement. The tentative settlement agreement provides for Pearl and IASN to be dismissed from this action after the payment of a settlement amount, which may take up to a year.

Plaintiffs and Defendant Chicago Rehabilitation Collective PLLC are still engaging in settlement negotiations. The parties are negotiating about releases or alternatives to releases, as well as the settlement amount to be paid to Plaintiffs by Chicago Rehab.

Plaintiffs and United Methodist Homes and Services have not agreed to settlement terms and are not currently engaged in further negotiations.

Plaintiffs and Defendants John Callen, MedRehab Alliance, LLC, MedRehab Alliance Interstate, LLC, MedRehab Therapy Associates of Illinois, LLC, Joint & Neuro Rehab Associates, LLC, and MedRehab Alliance Wisconsin, LLC have not agreed to settlement terms. On October 31, 2022, Callen and these companies made a settlement counter-offer to Plaintiffs, which Plaintiffs are now considering.

## **II. Plaintiffs' Proposed Discovery Schedule**

Plaintiffs propose the following discovery schedule:

Deadline to complete fact depositions:	April 3, 2023
Deadline for Plaintiffs' expert disclosures and reports:	May 2, 2023
Deadline for Defendants' expert disclosures and reports:	June 2, 2023
Deadline for completion of expert discovery as to Plaintiffs' experts:	June 16, 2023
Deadline for completion of expert discovery as to Defendants' experts:	July 17, 2023
Deadline for filing dispositive motions:	August 14, 2023
Responses to dispositive motions:	Due 30 days after filing of motion
Replies for dispositive motions:	Due 30 days after filing of motion
Expected trial date:	December 4, 2023

Dated: November 1, 2022

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*Plaintiffs Symbria, Inc., Symbria  
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Connecticut, LLC, Alliance Rehab  
HVA, L.L.C., GreatBanc Trust  
Company, in its capacity as Trustee of  
the Symbria, Inc. Employee Stock  
Ownership Trust, and the Symbria,  
Inc. Employee Stock Ownership Trust*